Goncalves et al. v. Washington State University

Exploring Discovery Limits, Kohberger's "Innocence" as a Defense, and Why This Is a Strong, Plausible Negligence Case Likely Headed to Trial!

Civil Complaint Filed: January 7, 2026 – Skagit County Superior Court (126 pages)

Educational Only – Not Legal Advice

BigAmishMedia(BAM) Legal Series January 2026

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Foreword

This guide is part of the Big Amish Media Legal Series (BAM), created to provide clear, educational insights into high-profile legal matters using publicly available information. Our goal is to help readers understand civil litigation principles, procedural steps, and how cases are evaluated in Washington courts, without offering legal advice.

The events underlying this guide—the 2022 murders at the University of Idaho—are tragic, and our focus is on understanding the civil case filed against Washington State University (WSU), not relitigating the criminal proceedings. The civil lawsuit examines institutional accountability, alleged negligence, and potential systemic failures.

To help readers navigate this complex Complaint, we have included a **Complaint Roadmap Appendix** before the main analysis. This roadmap organizes the Complaint's allegations by topic, paragraph references, and key claims, so readers can quickly locate specific sections of interest. Throughout the guide, paragraph citations (¶) correspond to the Complaint, allowing you to cross-reference the source material.

This guide is intended for educational purposes only. Please read the Important Disclaimer on the following page before reviewing the analysis.

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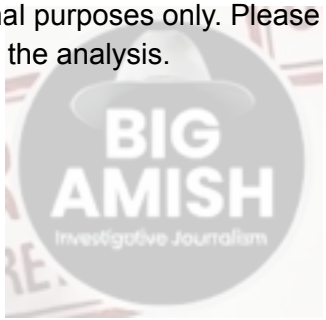

Important Disclaimer:

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APPENDIX A

COMPLAINT ROADMAP

Goncalves et al. v. Washington State University
(Filed Jan. 7, 2026 — Skagit County Superior Court, 126 pages)

How to Use This Table:
Each row corresponds to a legal issue discussed in this Guide. Readers can open the Complaint PDF and scroll to the paragraph ranges listed to verify allegations directly. Paragraph numbers are taken from the Complaint's internal numbering; some ranges are approximate due to the Complaint's length and narrative structure.

1. CORE STRUCTURE & PARTIES

Topic	Paragraph Range	What the Complaint Alleges	Exhibits	Why It Matters Legally
Parties & Jurisdiction	¶¶ 1–6	Identifies Plaintiffs (estates of four victims), Defendant (WSU), venue, and basis for jurisdiction	—	Establishes standing, venue, and scope of court authority
Overview of Case	¶¶ 1–6	Framing language asserting murders were foreseeable and preventable due to institutional failures	A	Sets negligence and causation theory from the outset

2. UNIVERSITY–KOHBERGER RELATIONSHIP (DUTY & CONTROL)

Topic	Paragraph Range	Key Allegations	Exhibits	Legal Significance
Recruitment & Employment	¶¶ 1–4; ~60–90	WSU recruited Kohberger, hired him as PhD student and Teaching Assistant	F–G	Supports employer–employee "special relationship"

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Compensation & Benefits	~65–95	Salary, tuition waiver, health insurance, housing access	F	Shows institutional control and leverage
Authority Over Conduct	~90–120	Academic supervision, evaluations, disciplinary authority	G	Supports duty to supervise/control under Restatement § 317

3. ESCALATING WARNING SIGNS & CONDUCT

Topic	Paragraph Range	Key Allegations	Exhibits	Why It Matters
Early Red Flags	¶¶ 8–16	Initial troubling behavior toward women; intimidation and boundary violations	C	Establishes foreseeability timeline
Pattern of Harassment & Stalking	~240–275	Repeated incidents involving female students; escalating conduct	D–E	Shows ongoing risk, not isolated behavior
Faculty & Staff Concerns	~260–280	Professors and staff allegedly expressed concern about Kohberger	I–J	Demonstrates actual notice

4. FORMAL COMPLAINTS & NOTICE

Topic	Paragraph Range	Key Allegations	Exhibits	Legal Relevance
Number of Reports	¶¶ ~270–281	At least 13 formal complaints submitted to WSU	C–E	Establishes actual knowledge
Nature of Complaints	~270–290	Stalking, harassment, threatening behavior	C–E	Triggers duty to act

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Reporting Channels	~275–300	Complaints routed through Title IX / compliance offices	K–L	Supports Title IX claim

5. POLICY FAILURES & INSTITUTIONAL INACTION

Topic	Paragraph Range	Key Allegations	Exhibits	Why It Matters
Failure to Investigate	¶¶ 13–16; ~290–330	Alleged failure to meaningfully investigate complaints	H	Breach of duty
Ignoring Own Policies	~330–380	Failure to follow WSU EP15, EP42, threat assessment protocols	H	Evidence of negligence
Threat Assessment Failures	~350–400	No meaningful WAVR-21 or equivalent evaluation	I	Key foreseeability evidence

6. FORESEEABILITY, CAUSATION & THE MURDERS

Topic	Paragraph Range	Key Allegations	Exhibits	Legal Impact
Murders Described	¶¶ 3–6	Facts of Nov. 13, 2022 murders	A	Establishes harm
Foreseeability Allegations	~300–315; ~430	Murders alleged to be predictable outcome of inaction	H–J	Defeats superseding cause defense
Causal Link	~470–480	WSU's failures allegedly enabled Kohberger	H–I	Proximate cause theory

7. TITLE IX — DELIBERATE INDIFFERENCE

Topic	Paragraph Range	Key Allegations	Exhibits	Legal Standard
Actual Knowledge	¶¶ ~430–440	WSU knew of gender-based harassment/stalking	K–L	Davis v. Monroe

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Unreasonable Response	¶¶ ~440–455	Response allegedly “clearly unreasonable”	K–L	Deliberate indifference
Gender-Based Harm	¶¶ ~450–465	Female students disproportionately targeted	K	Title IX applicability

8. NEGLIGENCE & WRONGFUL DEATH COUNTS

Topic	Paragraph Range	Key Allegations	Exhibits	Why It Matters
Negligence Elements	¶¶ ~470–480	Duty, breach, causation, damages pleaded explicitly	H–I	CR 12(b)(6) sufficiency
Wrongful Death	¶¶ ~480–495	Statutory wrongful death damages	A–B	Remedies
Comparative Fault	¶¶ ~500–510	Anticipates allocation of fault	—	RCW 4.22.070

9. DAMAGES & RELIEF REQUESTED

Topic	Paragraph Range	Key Allegations	Exhibits	Notes
Compensatory Damages	¶¶ ~510–520	Economic and non-economic losses	A	Allowed under WA law
Emotional Distress	¶¶ ~520–530	Severe emotional harm to families	A	Common in wrongful death
Injunctive / Policy Relief	¶¶ ~530–540	Requests for institutional reform	K–L	Public-interest aspect
Punitive Damages	Addressed / Disclaimed	Not available against WSU	—	Correctly limited

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Introduction.

The civil case filed by the victims' estates against WSU alleges that the university failed to act on known warning signs, creating foreseeable risks that contributed to the deaths of four students. The Complaint spans 126 pages, detailing interactions, policies, and institutional responses that plaintiffs claim demonstrate negligence, deliberate indifference under Title IX, and failures in threat assessment protocols.

This guide breaks down these allegations, explains the relevant Washington law on negligence, duty, breach, and foreseeability, and examines the likely procedural path of the case, including discovery, motions, and potential trial issues. The **Complaint Roadmap Appendix**, included immediately before this analysis, provides an organized view of the allegations with paragraph references and key topics, making the dense Complaint more accessible.

Readers will gain a clearer understanding of:

How civil liability differs from criminal guilt.
The elements of negligence and how they apply to universities.
Procedural safeguards and limitations on discovery.
Potential strengths and weaknesses of the case.
How victim impact statements and institutional records factor into the civil claims.

By providing both context and analysis, this guide aims to empower readers with knowledge of civil litigation principles, while keeping focus on publicly available facts and avoiding speculation about criminal guilt.

LEGAL ANALYSIS

As of January 10, 2026, no motions or responses have been filed yet, so this is based on general Washington law and the Complaint's allegations.

I. Addressing Public Questions: Can Discovery Prove Bryan Kohberger's Innocence as a WSU Defense?

Short answer: **No, this is not possible.** This civil lawsuit cannot "prove" Kohberger's innocence for several key reasons, rooted in the separation of civil and criminal proceedings, the finality of his criminal conviction, and the limited scope of discovery. Here's a breakdown for everyday people, with citable support:

- **Kohberger's Criminal Case Is Closed and Binding**: Kohberger pleaded guilty on July 2, 2025, to four counts of first-degree murder and one count of burglary, receiving four consecutive life sentences without parole on July 23, 2025 (Complaint ¶¶ 5, 365–366). A guilty plea is a judicial admission of guilt, treated as conclusive in subsequent civil cases under Washington law (e.g., Safeco Ins. Co. v. McGrath, 42 Wn. App. 58, 708 P.2d 657 (1985), holding criminal convictions estop relitigation of facts). WSU cannot use this civil suit to challenge or "prove" his innocence because the criminal matter is res judicata (final and binding). Any attempt to relitigate his guilt would likely be barred by collateral estoppel (Kyriakos v. Goulandris, 151 Wn.2d 685, 91 P.3d 892 (2004), applying estoppel to prevent inconsistent judgments). The Complaint explicitly states the murders were

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committed by Kohberger, focusing on WSU's alleged role in enabling them through inaction, not his guilt (¶¶ 3–6, 315–360).

- **Civil vs. Criminal Focus**: This is a **civil** wrongful death/negligence suit, not a criminal retrial. Civil cases seek money damages for harm caused by negligence, with a lower "preponderance of evidence" standard (more likely than not), not "beyond reasonable doubt" (Tegman v. Accident & Med. Investigations, Inc., 150 Wn.2d 102, 75 P.3d 497 (2003)). WSU's potential defenses would focus on denying duty, breach, or causation—not retrying Kohberger's guilt. Even if WSU argued the murders were unforeseeable due to Kohberger's actions alone, Washington law holds that criminal acts don't automatically absolve liability if foreseeable (Hartley v. State, 103 Wn.2d 768, 698 P.2d 77 (1985)).
- **Why Discovery Won't Touch Kohberger's Innocence**: Discovery (evidence exchange) in civil cases is broad under Washington Civil Rules (CR 26), allowing interrogatories, depositions, document requests, and subpoenas to uncover relevant facts. However, courts strictly limit it to "relevant" matters—those reasonably calculated to lead to admissible evidence on the claims/defenses (CR 26(b)(1)). Probing Kohberger's innocence would be irrelevant here, as his guilt is established and not at issue. A judge could issue protective orders to quash such requests if they appear as a "fishing expedition" or unduly burdensome (CR 26(c); e.g., Rhinehart v. Seattle Times Co., 98 Wn.2d 226, 654 P.2d 673 (1982), affirming limits on discovery to protect privacy and prevent abuse). In similar university liability cases, discovery focuses on institutional knowledge/actions, not relitigating third-party crimes (e.g., Barlow v. State, 101 Wn.2d 101-045-1 (2024), where discovery centered on university control and foreseeability, not the assailant's guilt). If WSU tried this as a defense, plaintiffs could move to strike it as immaterial (CR 12(f)).

In summary: Discovery will likely be confined to WSU's internal records (e.g., complaints, emails, policies) and witness depositions about what WSU knew/did—not Kohberger's criminal proceedings. This protects the integrity of his closed criminal case while keeping the civil suit focused.

II. How the Court Will Limit Discovery

Discovery in Washington civil cases is governed by CR 26–37, promoting broad access to "discoverable" information but with judicial safeguards against overreach. Here's how limits apply, explained for everyday people with citations:

- **Relevance Standard**: Discovery must be "relevant to any party's claim or defense" and proportional to the case's needs (CR 26(b)(1)). In this negligence suit, it's limited to WSU's duty (e.g., control over Kohberger via employment/policies, ¶¶ 61–160; Exhibits F–G – TA Assignment Records, Supervision Emails)., breach (e.g., ignoring 13 complaints, ¶¶ 249–297; Exhibits C–E), and foreseeability (e.g., escalating red flags, ¶¶ 7–16; Exhibit H – Campus Safety Logs). Irrelevant probes (e.g., into Kohberger's innocence) would be quashed.
- **Protective Orders and Motions**: Parties can seek court orders to limit discovery if annoying, embarrassing, oppressive, or unduly burdensome (CR 26(c)). For example, in

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Rhinehart v. Seattle Times (98 Wn.2d 226 (1982)), the court limited publication of discovered info to protect privacy. Here, sensitive student complaints or WSU personnel files might be redacted or sealed (See Complaint ¶¶ 279–280; Exhibits C–E).

- **Phased or Bifurcated Discovery**: Courts can phase discovery (e.g., first on liability, then damages) to avoid waste (CR 26(d)). In university cases like Barlow, discovery was limited to foreseeability facts before broader inquiries **(Complaint ¶¶ 61–160, 249–297**).
- **Privilege and Immunity Defenses**: WSU, as a state entity, may claim sovereign immunity limits (RCW 4.92.090), restricting discovery on certain internal deliberations (e.g., deliberative process privilege, Barfield v. City of Seattle, 100 Wn.2d 878 (1984)). Title IX claims allow federal removal, potentially applying Fed. R. Civ. P. 26 with similar limits on discovery before a federal court.

As the case is new, no discovery has started—WSU has ~20 days to respond (CR 12(a)(1)). Expect motions to limit scope early.

III. Core Issues: Duty, Breach, and Foreseeability as Jury Questions – Why Trial Is Likely
Washington negligence law requires proving: (1) duty, (2) breach, (3) causation, and (4) damages (Schooley v. Pinch's Deli Market, 134 Wn.2d 468 (1998)). Here, these boil down to jury questions, making early dismissal unlikely and trial probable:

- **Duty**: WSU owed a duty due to its "special relationship" with Kohberger (employer-employee, Restatement (Second) of Torts § 315(a); Complaint ¶¶ 437–461). Duty to control to prevent harm (§ 317) and avoid creating risk (§ 302B) (¶¶ 441, 443). In university contexts, duty extends if control exists, even off-campus if foreseeable (Meyers v. Ferndale Sch. Dist., 197 Wn.2d 68 (2021); Barlow v. State (2024), though no duty found there, facts differed). Jury decides if WSU's policies (e.g., TAT, WAVR-21) created duty (¶¶ 105–115, 446–447).
- **Breach**: WSU allegedly breached by ignoring 13 complaints, not assessing threats, and prioritizing finances (¶¶ 13–18, 249–297, 475). Breach is a fact question for juries (Foreseeability and Duty in Washington Negligence Law, Seattle U. L. Rev. (2024)).
- **Foreseeability/Causation**: Murders were foreseeable from escalating behavior (¶¶ 4, 303–314, 432). "Foreseeability is generally a jury question" unless clearest cases (Christen v. Lee, 113 Wn.2d 479 (1989); Hartley v. State). Proximate cause also jury-decided (Schooley).

These are "generally questions for the jury," surviving motions to dismiss/summary judgment (CR 12(b)(6), 56; Kvistad v. City of Seattle, 196 Wn. App. 892 (2016)). In Barlow, similar issues went beyond dismissal due to fact disputes.

IV. Why the Case Is Plausible on Its Face and a Strong Negligence Claim
The Complaint states a plausible claim: Facts, taken as true, show duty (special relationship/control, ¶¶ 437–461), breach (inaction on known risks, ¶¶ 475), causation (foreseeable harm, ¶¶ 477), and damages (wrongful death, ¶¶ 478). It survives CR 12(b)(6) if allegations allow relief (Davis v. City of Seattle, 152 Wn.2d 299 (2004)). Strength from: Actual knowledge (13 complaints), policy violations (Title IX, EP15), and foreseeability precedents.

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Similar suits (e.g., against schools for ignoring harassment) often proceed to juries or settle (ACLU v. Aberdeen Sch. Dist.). Washington's pure comparative fault (RCW 4.22.005) keeps it viable even with shared fault.

V. Why this is not a "complex" case legally (despite the page count):
At its core, this is a classic negligence claim against a university for allegedly failing to act on known risks. Washington law breaks negligence down into four simple, well-established elements that are taught in first-year law school and applied daily in courts:Duty — Did WSU owe a legal duty to protect others from Kohberger's foreseeable harm? (Based on whether WSU had a "special relationship" of control as his employer/supervisor — a standard principle under Restatement (Second) of Torts §§ 315, 317, and Washington cases like Meyers v. Ferndale Sch. Dist., 197 Wn.2d 68 (2021).)

- Breach — Did WSU fail to meet that duty? (Here, allegedly by ignoring 13 complaints, not conducting threat assessments, and violating its own policies — a straightforward factual question.)
- Causation — Did the breach cause or contribute to the harm? (Proximate cause and foreseeability — classic jury questions under Schooley v. Pinch's Deli Market, 134 Wn.2d 468 (1998), and Hartley v. State, 103 Wn.2d 768 (1985).)
- Damages — Were there actual injuries? (Wrongful death, emotional distress — clear from the victims' estates.)

These are not novel, unsettled, or cutting-edge legal theories. Courts have applied them for decades in similar negligence suits involving third-party criminal acts, universities, workplaces, and educational supervision. The law itself is textbook and predictable.

The 126 pages of the Complaint are long because of the facts, not the law:

- The plaintiffs meticulously document every alleged warning sign (13 formal complaints, specific emails, professor warnings, policy violations, and detailed incidents of stalking/harassment).
- They quote from WSU's own handbooks, executive policies (EP15, EP42), and threat assessment tools (WAVR-21).
- They detail Kohberger's employment relationship, housing, and control.

This level of detail is actually a strength: it makes the allegations more concrete and harder to dismiss early. Judges must accept the facts as true at the motion-to-dismiss stage (CR 12(b)(6); Davis v. City of Seattle, 152 Wn.2d 299 (2004)). A bare-bones complaint might get thrown out; a heavily detailed one like this is far more likely to survive and proceed to discovery and trial.

VI. What is typically considered a 'complex' civil case?
In contrast, truly complex civil cases usually involve one or more of the following:

- **Novel or unsettled legal questions** (e.g., emerging areas like AI liability, cryptocurrency fraud, or novel constitutional claims that require interpreting new statutes or Supreme Court precedents).

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- **Highly technical or scientific evidence** (e.g., mass torts like asbestos, pharmaceutical liability, or environmental contamination cases requiring expert testimony on epidemiology, toxicology, or engineering).
- **Massive multi-party litigation** (e.g., class actions with thousands of plaintiffs, multi-defendant corporate conspiracies, or nationwide multidistrict litigation).
- **Intertwined federal/state/international law** (e.g., patent disputes, antitrust cases involving global markets, or complex securities fraud under multiple regulatory regimes).

This case does not fall into those categories. It is a straightforward negligence/wrongful death action with well-known legal standards, a single defendant (WSU), and a clear set of plaintiffs (the four victims' estates). The length comes from the seriousness and thoroughness of the factual allegations, not legal complexity. That factual depth actually makes it more plausible and harder for WSU to win early dismissal.

VII. Potential Weaknesses of the Case

While the case appears strong on its face, no lawsuit is guaranteed success. Here are key potential weaknesses, explained simply with citable support—WSU could raise these in defenses, motions, or at trial:

- **Sovereign Immunity and Limited Liability for Public Entities**: As a state university, WSU may claim partial immunity under RCW 4.92.090 (waiving immunity for torts but with caps or exceptions). Punitive damages are unavailable (City of Newport v. Fact Concerts, Inc., 453 U.S. 247 (1981)). Courts sometimes dismiss claims against public schools if no "special relationship" is proven (Barlow v. State (2024), where no duty found due to lack of control over the assailant off-campus). This could limit damages or narrow claims.
- **No Duty Off-Campus or to Non-Students**: WSU might argue no duty existed because the murders occurred off-campus and involved non-WSU students (University of Idaho victims). Washington law requires a "special relationship" for duty (Restatement (Second) of Torts § 315; Meyers v. Ferndale Sch. Dist. (2021), extending duty only if foreseeable and under control). If the judge rules as a matter of law that the harm was not foreseeable "in the clearest cases" (Christen v. Lee (1989)), early dismissal possible.
- **Break in Causation Due to Criminal Act**: Even if duty/breach exist, WSU could claim Kohberger's intentional crime broke the chain of causation (superseding cause doctrine). While Washington rejects automatic bars for foreseeable crimes (Hartley v. State (1985)), if deemed unforeseeable, this weakens causation (Schooley v. Pinch’s Deli Market (1998)).
- **Title IX Challenges**: Proving "deliberate indifference" requires showing WSU's response was "clearly unreasonable" (Davis v. Monroe County Bd. of Educ. (1999)). If WSU proves partial actions (e.g., any investigation), this claim could fail. Off-campus application is debated (Barlow (2024)).
- **Evidentiary Hurdles and Statute of Limitations**: Some evidence might be privileged (deliberative process, Barfield v. City of Seattle (1984)). The three-year statute for negligence (RCW 4.16.080) is met (filed within timeline), but any delay arguments could arise.

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- **Comparative Fault Risks**: Under pure comparative fault (RCW 4.22.005), a jury could assign partial fault to others (e.g., Kohberger, victims' actions), reducing damages. **This doesn't kill the case but weakens recovery.**

Overall, these are standard defenses in university negligence suits—many survive early motions but settle (e.g., similar Title IX cases). The Complaint's detail (13 complaints) counters many weaknesses.

VIII. Victim Impact: Ties to Criminal Case Statements and Potential for Additional Plaintiffs (e.g., Survivors DM and BF)

The human toll of this tragedy is profound, as highlighted in the victim impact statements from Kohberger's criminal sentencing on July 23, 2025. These statements, delivered by family members, underscore the lasting devastation and call for accountability—echoing themes in this civil suit. For example:

- Steve Goncalves (Kaylee's father) spoke of the "unimaginable loss" and how "systems failed" to protect, tying into WSU's alleged inaction.
- Scott Laramie (Madison's stepfather) described the "endless grief" and questioned institutional oversights.
- Jeff Kernodle (Xana's father) emphasized "preventable failures," aligning with the Complaint's foreseeability claims (¶¶ 4, 477).
- Stacy Chapin (Ethan's mother) highlighted the "ripple effects" on communities, reinforcing the suit's push for systemic change.

These statements amplify the civil case's focus on prevention and accountability, showing how WSU's alleged negligence exacerbated the families' suffering.

Regarding potential additional plaintiffs like the surviving roommates—Dylan Mortensen (DM) and Bethany Funke (BF), who were home during the murders but unharmed physically—they have not joined this lawsuit as of January 10, 2026. They could theoretically file separate claims for emotional distress (e.g., intentional infliction of emotional distress, IIED) or negligence, as survivors exposed to trauma. However:

- **Statute of Limitations**: Washington's SOL for negligence/personal injury (including IIED) is generally 3 years from the date of injury (RCW 4.16.080(2)). The murders occurred November 13, 2022, so the deadline was around November 13, 2025. As of January 10, 2026, this period has expired, likely barring new filings unless tolled (e.g., by discovery rule for latent injuries, RCW 4.16.190, or death tolling under RCW 4.16.200, but these rarely apply to survivors). Joining the existing suit might be possible via amendment (CR 15), but after SOL, it's unlikely without relation back.
- **Relation Back Principle and Court Rule**: Under Washington Civil Rule 15(c), an amended pleading (e.g., adding plaintiffs) "relates back" to the original filing date if it arises from the same "conduct, transaction, or occurrence," and the opposing party (WSU) had notice of the action such that it won't be prejudiced. This avoids SOL bars for timely amendments. The principle prevents injustice from technicalities, as long as the original complaint gave fair notice (Perrin v. Stensland, 158 Wn. App. 185, 240 P.3d 1189

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(2010), applying CR 15(c) to allow relation back for new claims/parties if core facts are the same; see also Haberman v. Washington Pub. Power Supply Sys., 109 Wn.2d 107, 744 P.2d 1032 (1987), emphasizing notice and lack of prejudice). However, adding new plaintiffs post-SOL is rarer and requires showing the amendment doesn't introduce unrelated claims—here, DM/BF's potential claims stem from the same events, but a judge would decide.

- **Even If They Can't Sue**: DM and BF can absolutely serve as witnesses. Non-parties are often key in negligence suits (CR 45 for subpoenas). Their accounts of the night (e.g., DM's encounter with Kohberger) or WSU-related interactions could support foreseeability/breach, without needing plaintiff status. They testified in the criminal case, showing willingness.
- **BF's Testimony Details**: Bethany Funke did not testify in open court at the preliminary hearing. Instead, after fighting a subpoena to appear at Kohberger's June 26, 2023, preliminary hearing in Idaho (citing lack of jurisdiction over her as a Nevada resident), she agreed on April 28, 2023, to a recorded interview/testimony with Kohberger's defense team in Reno, Nevada, under oath but not in public court. This satisfied the defense's request for her information (which they claimed was exculpatory), avoiding the hearing appearance. At sentencing on July 23, 2025, a friend read her victim impact statement on her behalf, describing the trauma's ongoing effects. (Sources: NBC News timeline; CBS News report; TODAY.com article; Court TV coverage.)

This highlights how civil suits can extend justice beyond criminal proceedings, though timing is critical.

Conclusion.
This civil suit against Washington State University focuses on institutional conduct, not Bryan Kohberger's criminal case. It examines whether the university acted reasonably in light of known warnings, patterns of behavior, and policy obligations. Discovery will be limited to issues such as duty, breach, foreseeability, and damages—questions ultimately reserved for a jury. The Complaint documents multiple formal warnings, policy failures, and alleged patterns of escalating conduct. While no lawsuit outcome can be guaranteed, the claims are legally cognizable and likely to survive early procedural challenges.

For readers seeking additional clarity, **Appendix A: Complaint Roadmap** provides an organized overview of key allegations, paragraph citations, and supporting exhibits, allowing readers to navigate the legal arguments and verify sources efficiently.

This guide is intended to educate and inform, illustrating how negligence, foreseeability, and institutional accountability are applied under Washington law. Future **BAM Legal Guides** will continue to examine high-profile civil and criminal cases, offering practical insights into legal strategy, jury considerations, and the intersection of fact and law. Primary sources and court filings are cited below for those wishing to explore the case directly.

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IX. List of Sources

Below is a comprehensive list of sources cited, with direct URLs where available (verified as of January 10, 2026). Use these to read full texts. **Note:** Some may require free registration or be behind paywalls; alternatives like Justia or Cornell LII are often free.

- **Complaint PDF**: Goncalves et al. v. Washington State University (full 126-page filing). URL: https://static.foxnews.com/foxnews.com/content/uploads/2026/01/2026-01-07-goncalves-complaint-4899-6440-6150-v.1.pdf (Hosted by Fox News; also searchable on Skagit County Superior Court docket via https://www.law.com/radar/card/wa-skagitcounty-681031-goncalves-v-washington-state-university/).
- **Washington State Court Opinions (General Access)**: Free slip opinions from 2013 onward. URL: https://www.courts.wa.gov/opinions/.
- **Justia Washington Supreme Court Decisions**: Free full texts. URL: https://law.justia.com/cases/washington/supreme-court/.
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- **Oyez (U.S. Supreme Court Archive)**: Multimedia/full opinions. URL: https://www.oyez.org/.
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